

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Joseph G. DuMouchelle and Melinda
J. Adducci,

Debtors.

Chapter 7

Case No. 19-54531

Honorable Lisa Gretchko

Teodor Gelov,

Plaintiff,

v.

Melinda J. Adducci,

Defendants.

Adversary Pro. No. 20-04172

**PLAINTIFF'S LIMITED OBJECTION TO MOTION TO WITHDRAW AS
ATTORNEY BY PATRICK ANTHONY FOLEY**

Plaintiff, Teodor Gelov, through his undersigned counsel hereby submits his limited objection (“Limited Objection”) to Motion to Withdraw as Attorney by Patrick Anthony Foley (ECF No. 178; the “Withdrawal Motion”). For his Limited Objection, Plaintiff submits that the granting of the Withdrawal Motion should be conditioned on a substitution of counsel having first been filed to prevent undue delay in the progress of this proceeding.

Respectfully submitted by:

TAFT STETTINIUS & HOLLISTER, LLP

Dated: September 29, 2023

By: /s/ Jay L. Welford

Jay L. Welford (P34471)

Kimberly Ross Clayson (P69804)

Counsel to Plaintiff

27777 Franklin Road, Suite 2500

Southfield, Michigan 48034

Phone: (248) 351-3000

jwelford@taftlaw.com

kclayson@taftlaw.com

Counsel for Plaintiff Teodor Gelov

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Joseph G. DuMouchelle and Melinda
J. Adducci,

Debtors.

Chapter 7

Case No. 19-54531

Honorable Lisa Gretchko

Teodor Gelov,

Plaintiff,

v.

Melinda J. Adducci,

Defendants.

Adversary Pro. No. 20-04172

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2023, my office caused to be served a copy of the *Plaintiff's Limited Objection to Motion to Withdraw as Attorney by Patrick Anthony Foley* using the Court's electronic filing system which will send notice to all ECF participants registered to receive notice.

Respectfully submitted by:

TAFT STETTINIUS & HOLLISTER, LLP

Dated: September 29, 2023

By: /s/ Jay L. Welford
Jay L. Welford (P34471)
Kimberly Ross Clayson (P69804)
Counsel to Plaintiff
27777 Franklin Road, Suite 2500
Southfield, Michigan 48034
Phone: (248) 351-3000
jwelford@taftlaw.com
kclayson@taftlaw.com

Counsel for Plaintiff Teodor Gelov